

MICHELLE L. ROBERTS (SBN 239092)
CASSIE SPRINGER-SULLIVAN (SBN 221506)
SPRINGER-SULLIVAN & ROBERTS LLP
410 – 12th Street, Suite 325
Oakland, California 94607
Telephone: (510) 992-6130
Facsimile: (510) 280-7564
Email: mlr@ssrlawgroup.com
css@ssrlawgroup.com

Attorneys for Plaintiff
AUSTIN SHELTON
PAMELA E. COGAN (SBN 105089)
TINO XUAN DO (SBN 221346)
ROPER, MAJESKI, KOHN & BENTLEY
1001 Marshall Street, Suite 500
Redwood City, CA 94063-2052
Telephone: (650) 364-8200
Facsimile: (650) 780-1701
Email: pcogan@rmkb.com
tdo@rmkb.com

Attorneys for Defendant
LIBERTY LIFE ASSURANCE COMPANY OF
BOSTON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

AUSTIN SHELTON,

Plaintiff,

v.

LIBERTY LIFE ASSURANCE
COMPANY OF BOSTON,

Defendant.

CASE NO. CV 12-5269 JSW

**STIPULATION AND [PROPOSED]
ORDER SETTING DISCOVERY
DEADLINE TO MAY 17, 2013**

Plaintiff AUSTIN SHELTON and Defendant LIBERTY LIFE ASSURANCE
COMPANY OF BOSTON (collectively referred to as the “Parties”) through their respective
counsel stipulate as follows:

WHEREAS, on January 3, 2013, the Parties were ordered to participate in court-

sponsored mediation by the presumptive deadline of 90 days from the date of the Order, or April 3, 2013 (D.E. #22);

WHEREAS, the Parties are scheduled to mediate on March 26, 2013;

WHEREAS, on January 11, 2013, the Parties filed a Joint Case Management Statement, proposing a fact discovery deadline of April 19, 2013 (D.E. #25);

WHEREAS, the Parties attended a case management conference on January 18, 2013 and the Court's Civil Minutes set a briefing schedule for summary judgment motions but did not state a deadline for discovery (D.E. #26);

WHEREAS, in light of the mediation scheduled for March 26, 2013 and the Parties' desire to avoid costs associated with discovery prior to the opportunity to resolve the case early, the Parties jointly request that the discovery deadline be set to May 17, 2013;

WHEREAS, a discovery deadline of May 17, 2013 will not impact the current case schedule;

IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES:

The discovery deadline in this matter shall be set for May 17, 2013.

Dated: March 8, 2013

SPRINGER-SULLIVAN & ROBERTS LLP

By: /s/ Michelle L. Roberts

MICHELLE L. ROBERTS
CASSIE SPRINGER-SULLIVAN
Attorney for Plaintiff
AUSTIN SHELTON

Dated: March 8, 2013

ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ Tino X. Do

PAMELA E. COGAN
TINO X. DO
Attorneys for Defendant
LIBERTY LIFE ASSURANCE
COMPANY OF BOSTON

PURSUANT TO STIPULATION, IT IS SO ORDERED.

The discovery deadline in this matter shall be set for May 17, 2013. All other case deadlines shall remain in effect.

Dated: March 8, 2013


UNITED STATES DISTRICT COURT JUDGE
Hon. Jeffrey S. White

SIGNATURE ATTESTATION

I, Michelle L. Roberts, hereby attest that concurrence in the filing of the document has been obtained from the other signatory on this document.

DATED: March 8, 2013

By: /s/ Michelle L. Roberts
MICHELLE L. ROBERTS